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May 8, 2014

VIA ECF FILING

Honorable Viktor V. Pohorelsky
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201-1818

Re: *In re Air Cargo Shipping Services Antitrust Litigation*, 06-MD-1775 (JG)(VVP)

Dear Magistrate Judge Pohorelsky:

Plaintiffs and defendant EVA Airways Corporation respectfully submit the attached [Proposed] Stipulation and Order for a Limited Extension of Time to File a Motion to Compel. The parties have not previously made such a request.

The proposal is to enable plaintiffs and EVA to work out the foundation for the admissibility of a number of documents, and, if that fails, to conduct a Rule 30(b)(6) deposition in Taiwan on May 30, 2014. That deposition date would necessitate a short extension from June 2, 2014, to June 5, 2014, for plaintiffs to file any motion to compel with regard to the deposition, but would not extend the time by which EVA would respond to that motion.

Therefore, plaintiffs respectfully request that the court enter as an order the attached [Proposed] Stipulation and Order for a Limited Extension of Time to File a Motion to Compel.

Respectfully submitted,

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By: /s/ Howard J. Sedran

cc: All Counsel of Record (via ECF)

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

IN RE AIR CARGO SHIPPING
SERVICES ANTITRUST LITIGATION

MDL No. 1775

Master File 06-MD-1775 (JG) (VVP)

**[PROPOSED] STIPULATION AND ORDER FOR A
LIMITED EXTENSION OF TIME TO FILE A MOTION TO COMPEL**

WHEREAS on November 26, 2013, plaintiffs served a notice for a deposition of EVA Airways Corporation (“EVA”) under Rules 45 and 30(b)(6) of the Federal Rules of Civil Procedure for the purpose of establishing the admissibility of a number of documents, which plaintiffs anticipate may be used at trial;

WHEREAS on December 23, 2013, plaintiffs submitted a Stipulation and [Proposed] Order To Extend the Deadline for Plaintiffs To Take the Rule 30(b)(6) Deposition of EVA Airways Corporation until May 31, 2014;

WHEREAS on December 27, 2013, the Court entered an order extending to May 31, 2014, the deadline for plaintiffs to take the Rule 30(b)(6) deposition of EVA;

WHEREAS counsel for plaintiffs and EVA have met and conferred and continue to meet and confer to endeavor to reach an agreement about foundations for authenticity and admissibility of documents;

WHEREAS on April 23, 2014, the Court filed a Minute Entry setting a deadline for motions to compel discovery of June 2, 2014, with oppositions to such motions to be filed by June 16, 2014;

WHEREAS, if necessary, a Rule 30(b)(6) deposition of EVA cannot be conducted in Taiwan prior to May 30, 2014;

WHEREAS plaintiffs and EVA agree that, if such a deposition occurs, it is reasonable to allow plaintiffs an additional two days to file any motion to compel regarding the Rule 30(b)(6) deposition;

WHEREAS plaintiffs and EVA agree that, if plaintiffs file such a motion to compel on June 5, 2014, EVA will not require time beyond June 16, 2014 to file an opposition; and

WHEREAS plaintiffs and EVA have not previously sought such an extension to file a motion to compel;

THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and among the undersigned, that:

(1) The time for plaintiffs to file any motion to compel regarding a Rule 30(b)(6) deposition of EVA is extended from June 2 to June 5, 2014.

(2) The time for EVA to file an opposition to any motion of plaintiffs regarding a Rule 30(b)(6) deposition of EVA remains June 16, 2014.

Dated: May 8, 2014

Respectfully submitted,

/s/ Brent Landau

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/s/ Hollis L. Salzman

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Counsel for EVA Airways Corporation

So Ordered:

Victor V. Pohorelsky
United States Magistrate Judge

Dated: _____

CERTIFICATE OF SERVICE

I, Gregory K. Arenson, declare that, on May 8, 2014, I caused true and correct copies of the foregoing letter and attached [PROPOSED] Stipulation and Order for a Limited Extension of Time to File a Motion to Compel, to be delivered to all counsel of record via the Court's ECF system.

/s/ Gregory K. Arenson
Gregory K. Arenson